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*Attorneys for Plaintiff AXS Group LLC*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

AXS GROUP LLC,

Plaintiff,

v.

EVENT TICKETS CENTER, INC.,  
TICKETNETWORK, INC.; VIRTUAL  
BARCODE DISTRIBUTION LLC; and  
SECURE.TICKETS,

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**STIPULATION TO EXTEND TIME  
FOR PLAINTIFF AXS GROUP LLC  
TO RESPOND TO  
TICKETNETWORK, INC'S  
COUNTERCLAIMS**

**COUNTERCLAIMS SERVED:  
JANUARY 30, 2025**

**CURRENT RESPONSE DATE:  
MARCH 24, 2025**

**NEW REPOSENSE DATE:  
APRIL 23, 2025**

Plaintiff AXS Group LLC ("AXS") and Defendant TicketNetwork, Inc.'s ("TicketNetwork") by and through their respective counsel of record, stipulate and respectfully request that the Court extend the deadline for AXS to answer or otherwise respond to TicketNetwork's Counterclaims by thirty days.

WHEREAS, on January 16, 2024, AXS filed its Complaint in this action against five Defendants (ECF No. 1);

1 WHEREAS, AXS filed its First Amended Complaint on May 6, 2024, adding  
2 two additional Defendants (ECF No. 39);

3 WHEREAS, on December 9, 2024, AXS filed its Second Amended  
4 Complaint, adding TicketNetwork as an additional Defendant (ECF No. 83);

5 WHEREAS, on January 30, 2025, TicketNetwork filed its Corrected Answer  
6 and Counterclaims to Plaintiff AXS Group LLC's Second Amended Complaint (ECF  
7 No. 94), making AXS's answer deadline February 20, 2025;

8 WHEREAS, on February 13, 2025, the parties filed their first Stipulation to  
9 Extend Time for Plaintiff AXS Group LLC to Respond to Defendant Ticket Network,  
10 Inc.'s Counterclaims (ECF No. 99);

11 WHEREAS, on February 19, 2025, this Court extended AXS's answer  
12 deadline to March 24, 2025 (ECF No. 100);

13 WHEREAS, the parties have been engaging in discussions to explore a  
14 possible resolution of this matter;

15 WHEREAS, having additional time to engage in further discussions will be  
16 beneficial to the potential of a resolution;

17 WHEREAS, AXS and TicketNetwork agree to a thirty-day extension of time  
18 to AXS's deadline to answer or respond to TicketNetwork's Counterclaims so they  
19 can continue discussing a resolution to this matter.

20 NOW, THEREFORE, by and through their respective counsel of record, AXS  
21 and TicketNetwork stipulate to a thirty-day extension of time, making AXS's answer  
22 or response to TicketNetwork's Counterclaims due on April 23, 2025.

23 IT IS SO STIPULATED.  
24  
25  
26  
27  
28

1 Dated: March 24, 2025

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3 By: /s/ J. Michael Keyes  
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13  
14 Dated: March 24, 2025

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24  
25 Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all signatories listed, and on  
26 whose behalf the filing is submitted, concur in the filing's content and have  
27 authorized the filing.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2025, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ J. Michael Keyes  
J. Michael Keyes, SBN 262281